

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

PING WANG, EMILY LEHNES, EMILY
RAMOS, JENNIFER KILKUS, and JOHN
DOE, individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

THE CORPORATION OF MERCER
UNIVERSITY,

Defendant.

Case No. 5:23-cv-00193-TES

**PLAINTIFFS' MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

Under Federal Rule of Civil Procedure 23(e), Plaintiffs Ping Wang, Emily Lehnese, Emily Ramos, Jennifer Kilkus, and John Doe (collectively, "Plaintiffs") respectfully move this Court, pursuant to Federal Rule of Civil Procedure 23, for an Order: (i) granting final approval of the proposed Settlement; (ii) certifying the class for purposes of Settlement; and (iii) entering Judgment and dismissing all claims.

This Motion is based on (i) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement and its exhibits (filed concurrently herewith); (ii) all prior pleadings and proceedings had herein; (iii) arguments of counsel; and (iv) any other matters properly before the Court.

For the reasons described in Plaintiffs' Memorandum of Law in support of this Motion,

Plaintiffs respectfully request that this Court grant the Motion and enter the proposed Order.

DATED: April 3, 2025

Respectfully submitted,

/s/ William B. Federman

William B. Federman (admitted *pro hac vice*)

FEDERAMN & SHERWOOD

10205 N. Pennsylvania Ave.

Oklahoma City, OK 73120

-and-

4131 North Central Expressway, Suite 900

Dallas, Texas 75204

T: (405) 235-1560

wbf@federmanlaw.com

LAUKAITIS LAW LLC

Kevin Laukaitis*

954 Avenida Ponce De Leon

Suite 205, #10518

San Juan, PR 00907

T: (215) 789-4462

klaukaitis@laukaitislaw.com

Interim Co-Lead Class Counsel

Brian P. Adams

Georgia Bar No. 142474

Mary Beth Hand

Georgia Bar No. 322826

ADAMS LAW FIRM

598 D.T. Walton Sr. Way

Macon, GA 31201

T: (478) 238-0231

brian@brianadamslaw.com

mbhand@brianadamslaw.com

Liaison Counsel for Plaintiffs and the Class

MURPHY LAW FIRM

A. Brooke Murphy (admitted *pro hac vice*)

4116 Will Rogers Pkwy., Suite 700

Oklahoma City, OK 73108
T: (405) 389-4989
abm@murphylegalfirm.com

REESE LLP

Michael R. Reese
100 West 93rd Street, 16th Floor
New York, NY 10025
T: (212) 643-0500
F: (212) 253-4272

TURKE & STRAUSS LLP

Samuel J. Strauss
Raina Borrelli*
613 Williamson St., #201
Madison, WI 53703
T: (608) 237-1775
sam@turkestrauss.com
raina@turkestruass.com

**MILBERG COLEMAN BRYSON
PHILLIPS GROSSMAN, PLLC**

David K. Lietz
5335 Wisconsin Avenue NW
Washington, DC 20015-2052
T: (866) 252-0878
F: (202) 686-2877
dlietz@milberg.com

**KOPELOWITZ OSTROW FERGUSON
WEISELBERG GILBERT**

Kenneth J. Grunfeld*
65 Overhill Road
Bala Cynwyd, PA 19044
T: (954) 525-4100
grunfeld@kolawyers.com

Additional Attorneys for Plaintiffs and the Class

**pro hac vice forthcoming*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 3, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ William B. Federman
William B. Federman